

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

*Plaintiff,*

-against-

SEAN COMBS, JUSTIN DIOR COMBS, ETHIOPIA  
HABTEMARIAM, LUCIAN CHARLES GRAINGE,  
KRISTINA KHORRAM, CHALICE RECORDING  
STUDIOS, LOVE RECORDS, MOTOWN  
RECORDS, UNIVERSAL MUSIC GROUP, COMBS  
GLOBAL ENTERPRISES, JOHN and JANE DOES  
1-10 and ABC CORPORATIONS. 1-10,

*Defendants.*

Case No.: 1:24-cv-01457

**STIPULATION**

WHEREAS, on May 13, 2024, Plaintiff Rodney Jones filed a Proof of Service (ECF Doc. No. 46) stating that Defendant Kristina Khorram was purportedly served on May 7, 2024;

WHEREAS, the current deadline for Ms. Khorram to answer or otherwise respond to the Second Amended Complaint is May 28, 2024;

WHEREAS, the docket erroneously reflects a service date of April 29, 2024, and a response deadline of May 20, 2024;

WHEREAS, Ms. Khorram requires additional time to properly investigate the propriety of service and the allegations in the Second Amended Complaint and prepare her response; and

WHEREAS, the parties have not previously sought an extension of this deadline.

NOW THEREFORE, it is hereby stipulated and agreed by and between the undersigned attorneys, that:

1. The deadline for Ms. Khorram to answer or otherwise respond to the Second Amended Complaint shall be August 26, 2024.

2. Ms. Khorram does not waive, and expressly reserves, any and all defenses related to lack of subject-matter jurisdiction, lack of personal jurisdiction, improper venue, insufficient process, insufficient service of process, and failure to state a claim.

3. This Stipulation may be executed in counterparts, and facsimile or electronic signature shall be treated as original.

Dated: May 20, 2024  
New York, New York

By: Tyrone A. Blackburn, Esq.  
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